

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

ANGELICA JUNIOUS)	
)	
Plaintiff,)	
)	
v.)	Case No. 22-cv-3681
)	
SGT. W. BAKER #3159, R/OC CHENGARY)	Judge Edmond E. Chang
#16269, R/LT PURCELL #758, OFFICER)	
NEALON #18420, OFFICER WALZ #18563,)	Magistrate Judge Maria Valdez
OFFICER RAHN #17086, OFFICER GLAZIERS,)	
COOK COUNTY SHERIFF TOM DART,)	
and COOK COUNTY, ILLINOIS)	
)	
Defendants.)	

**DEFENDANTS' PURCELL, CHENGARY, WALZ AND RAHN'S
MOTION FOR LEAVE TO SUBSTITUTE AS COUNSEL
AND FOR EXTENSION OF TIME TO REPLY**

Defendants, Karen Purcell, Corinne Chengary, Ryan Walz and Jessica Rahn, pursuant to Local Rule 83.17, respectfully seek leave of this Court to allow William B. Oberts and Amy M. Kunzer of Tribler, Orpett & Meyer, P.C. to enter their appearance in place of counsel of record and that Antonio Lee and James O'Connor of the Cook County State's Attorney's Office, be granted leave to withdraw their appearances on behalf of these Defendants and that Defendants be granted an extension of time to file a reply in support of Defendants' Motion to Stay. ECF No. 104. Plaintiff's counsel does not object to the substitution, but opposes an extension of time.

In support thereof, Defendants state as follows:

1. Assistant State's Attorneys Antonio Lee and James O'Connor currently have appearances on file on behalf of Karen Purcell, Corinne Chengary, Ryan Walz and Jessica Rahn. ECF Nos. 5,19,49, and 72.

2. Defendants Karen Purcell, Corinne Chengary, Ryan Walz and Jessica Rahn wish to substitute William B. Oberts and Amy M. Kunzer of Tribler, Orpett & Meyer, P.C. as counsel of record in this matter and requests that Antonio Lee and James O'Connor appearances in this case be terminated.

3. Defendants understand there is currently pending a motion to stay and that a reply by Defendants is due on September 13, 2023. ECF Nos. 104, 106.

4. Defendants understand that private counsels will substitute as counsel for the CCSAO on behalf of the other defendants in this case.

5. Defendants request a short extension of time up to and including September 27, 2023 to file a joint reply on behalf of all defendants. During this time, the undersigned will work with new counsel for all defendants to coordinate the filing of a joint reply on behalf of all defendants.

6. No party will be prejudiced by this substitution, nor will the substitution of counsel impose any undue delay in the proceedings.

7. On September 11, 2023, Counsel for Defendants emailed Plaintiff's counsel advising of Defendants intent to file the instant motion and asking for Plaintiff's position. Plaintiff's counsel advised that Plaintiff does not oppose the substitution of counsel, but does oppose an extension of time for Defendants to file a joint reply.

WHEREFORE, Defendants Karen Purcell, Corinne Chengary, Ryan Walz and Jessica Rahn respectfully request that this Court allow William B. Oberts and Amy M. Kunzer of Tribler, Orpett & Meyer, P.C. to enter their appearances on behalf of Defendants and that Antonio Lee and James O'Connor be granted leave to withdraw their appearance on behalf of them in this

case and that Defendants be granted an extension of time up to and including September 27, 2023 to file a reply brief in support of Defendants' Motion to Stay. ECF No. 104.

Respectfully submitted,

KIMBERLY M. FOXX
State's Attorney of Cook County

By: /s/ William B. Oberts
Special State's Attorney
On behalf of Defendants Purcell,
Chengary, Walz and Rahn

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